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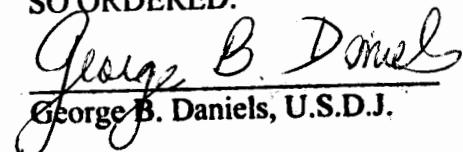
SEP 14 2021

September 14, 2021

Via ECF and Email

Honorable George B. Daniels
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

SO ORDERED:


George B. Daniels, U.S.D.J.

Dated: SEP 14 2021

Re: *United States v. Quaveon Ross*
20 Cr. 57-21 (GBD)

Dear Judge Daniels:

As Your Honor is aware, I am counsel to Mr. Quaveon Ross in the above-referenced matter. This correspondence is a joint application by the parties, requesting the Court issue an Order for the United States Department of Probation for the Southern District of New York (“Probation”) to prepare a Pre-Pleading Report to assist the parties in determining the appropriate Criminal History calculation applicable to Mr. Ross. Additionally, we also respectfully request a three week extension of the deadline to file pretrial motions, which is currently September 16, 2021.

Although the parties have engaged in plea negotiations, due to the complexity and age of some portions of Mr. Ross’s prior criminal history, it has been difficult for the parties to fashion specifics of a plea agreement. More specifically, the parties, despite investigation, have been unable to ascertain with certainty the number of criminal history points to be assessed for a number of New York State Youthful Offender Adjudications, as well as the status of a 2013 New York State Family Court matter.

The resolution of these questions regarding Mr. Ross’s prior criminal history is essential because it will have a significant bearing on Mr. Ross’s final Criminal History Category and advisory Guidelines sentencing range.

Therefore, to assist the parties in resolving this issue, continuing in plea negotiations and to facilitate counsel in properly advising Mr. Ross in deciding between a guilty plea and trial, it is respectfully requested that the Court endorse this joint application and Order that Probation prepare a Pre-Pleading Report to determine the defendant's Criminal History Category. Furthermore, because defense pretrial motions are due September 16, 2021, we request that the Court order: (i) that Probation prepare the Pre-Pleading Report within two weeks; and (ii) that the Court extend the deadline for defense motions by three weeks, to October 7, 2021, so that the parties will have sufficient time to review the Report and accordingly continue plea negotiations.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Richard J. Ma

Richard J. Ma, Esq.

cc via email: A.U.S.A. Peter Davis